

### **Pre-Meetings for Cleanup Standards Meeting - November 29/30, 1995**

Two meetings were held between DOE, Kaiser-Hill and RMRS legal and technical staff prior to the full group meeting

#### **Pre-Meeting - November 29, 1995**

DOE legal was not present and was not aware of the meeting on the 30th Mike McCann took the action to update Tim Howell for the meeting

Mike McCann described the history of the point of compliance and standards negotiations in the past and that the Agencies had not responded to DOE's last position paper as they felt it was too confusing He stated that the DOE would probably give on the point of compliance if the rad standards were relaxed He also stated that DOE HQ will only agree to rad guidelines, not enforceable standards

The group discussed the warm water 2 plus fish standard This is not realistic for the site as fish cannot be supported This is probably the only place in Colorado where warm water 2 with fish is the standard Melinda Kassen pointed out that Joe Schieffelin sets ARARs, not Jeb Love and Judy Bruch We should either develop a consensus opinion, or options

#### **Pre-Meeting - November 30, 1995**

Steve Slaten stated that the legal meeting was canceled Due to a breakdown in communication, DOE legal was not notified in time to participate However, our group should still try to develop the walk-away standard as well as the interim standard for the site Melinda Kassen pointed out that the interim standards would drive the groundwater action levels In addition, she pointed out that in the CDPHE provided single text, the language concerning the WQCC was inappropriate However, the ACLs seem to provide some relief concerning discharge from the temporary treatment facility But this relief seems to be taken away by the next sentence During remediation activities, it will not be possible to guarantee that 0 15 pCi/l will never be exceeded at the site boundary

The following items were written on the board to clarify negotiation differences Insufficient time was available to complete the list

Item	State	Site
1	Ponds are in Area 3	Ponds are in Area 2
2	Role of WQS	WQS are potential ARARs
3	ACLs for remedial activities	ACL (?) POC (?)
4	SW Pu std 0 15 pCi/l	walk away ok
5	SW Am std 0 15 pCi/l	walk away ok
6	SW POC for rads at term pond outfall	
7	SW non rad standards Table #	
8	SW non rad POC Area 3	
9	SW non rad POC Area 4	
10	GW standards = SW standards	
11	GW action level = 100 X MCL (Tier 1)	
12	GW action level Tier 2 & 3=GW stds	
13	GW action trigger locations Tier 1	
14	GW action trigger locations Tier 2	
15	GW action trigger locations Tier 3	

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